

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Carolyn Betton, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 4:05CV1455 (JCH)
	)	
St. Louis County, Missouri,	)	
	)	
Defendant.	)	

**Plaintiffs' Motion for Injunctive Relief**

COMES NOW plaintiffs and move the court for injunctive relief. In support of their motion, plaintiffs state:

1. This court entered judgment in favor of Carolyn Betton, Jurlean Johnson, Charlene King, Colette Howard on their retaliation claims under the Missouri Human Rights Act.
2. The Missouri Human Rights Act, 213.111.2 authorizes the court to enter injunctive relief as a form of relief for violations of the Act.
3. In order to effect the purposes of the Act and eradicate the harm caused by defendant's unlawful conduct and to avoid similar harm in the future, certain injunctive relief should be granted, specifically:

A. Defendant should be ordered to permanently remove from all of its records including, but not limited to personnel files and all official and unofficial files kept on plaintiffs, all references to the "Supervisor Comments" as set forth in Trial Exhibits 12 and 15 relating to Jurlean Johnson and Carolyn Betton and the "Supervisor Comments" themselves. Further, defendant should be ordered to

certify that it has complied with this order, detailing the work that was done to accomplish its mandate.

B. Defendant should be ordered to revise its procedure for handling complaints of discrimination in order to protect persons who raise such complaints from retaliation and, further, to remedy the claimed perception by defendant's managers that only "formal" complaints of discrimination made to only certain people are covered by the Missouri Human Rights Act and its prohibition against retaliation. Defendant should be required to engage a third party approved by the court to review and approve the revised policy and then to certify to this court that it has made such changes.

C. Defendant should be ordered to train its employees in the procedure described in Paragraph B, and certify to this court that it has done so.

WHEREFORE, plaintiffs ask that their motion be granted.

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The undersigned certifies that a copy of the foregoing was served on March 29, 2010 on the clerk of the court using the ECF system which will notify the following counsel of record of its filing: Michael A. Shuman and Robert H. Grant, Sr.

s/ D. Eric Sowers